

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Experimental Presorted  
Priority Mail Rate Categories, 2001

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Docket No. MC2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: ROBERT F. KALENKA (OCA/USPS-T3-1-2)  
(April 5, 2001)

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Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate ("OCA") hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-6 to witness Thomas M. Scherer dated March 23, 2001, are hereby incorporated by reference.

Respectfully submitted,



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OCA/USPS-T3-1. Please refer to your testimony at page 5, lines 7-8.

- a. Does the Group One software possessed by ADP have the capability to arrange mailing lists in presort order for pieces mailed at Priority Mail rates? Please explain.
- b. To what extent does ADP currently use the Group One or any other software to presort Priority Mail pieces? What depth of sort does ADP typically achieve? Please explain.

OCA/USPS-T3-2. Please refer to your testimony at page 6, lines 18-20.

- a. What percent of ADP's Priority Mail volume is currently mailed at the \$3.50 one-pound Priority Mail rate?
- b. In 1999 and 2000, what was ADP's total Priority Mail volume?
- c. In 1999 and 2000, what percent of ADP's Priority Mail volume was mailed at the two-pound Priority Mail rate?

#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Stephanie Wallace

Washington, D.C. 20268-0001  
April 5, 2001